

**THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI**

**IN THE MATTER OF A CRIMINAL  
COMPLAINT AGAINST  
MAHAMUD TOOXOOW MAHAMED**

*19-mj-2008DR*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Stacy Lee Moore, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent with the FBI since 2004, and I am currently assigned to the Kansas City Division, Joplin, Missouri, Resident Agency. Since joining the FBI, I have conducted investigations involving kidnapping and the sexual exploitation of children, including coercion and enticement and transportation of minors.
2. As part of my duties with FBI, I investigate criminal violations of Title 18 of the United States Code, including violations of 18 U.S.C. § 1201, that is, kidnapping.
3. The statements in this affidavit are based on personal observations, my training and experience, investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, this affiant has not included each and every fact known to me concerning this investigation. The affiant has set forth the facts necessary to establish probable cause to believe that Mahamud Tooxoow MAHAMED has violated 18 U.S.C. § 1201(a)(1) and (g), that is, kidnapping of a minor.

**STATUTORY AUTHORITY**

4. 18 U.S.C. § 1201(a)(1) prohibits any person from unlawfully seizing, confining, inveigling, decoying, kidnapping, abducting, or carrying away and holding for ransom or reward or otherwise any person, or attempting to do so, except in the case of a minor by the parent thereof,

which occurs when the person is willfully transported in interstate or foreign commerce, regardless of whether the person was alive when transported across a State boundary, or the offender travels in interstate or foreign commerce or uses the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense. The term “minor,” as defined in 18 U.S.C. § 1201(g), refers to any “children” who has not yet attained the age of eighteen years.

#### **PROBABLE CAUSE**

5. On July 29, 2019, the McDonald County, Missouri, Sheriff’s Office (MCSO) received a report of a deceased body that was located off of Missouri Highway 59 between Lanagan, Missouri, and Noel, Missouri. The deceased female was located in a partially unclothed state within a suitcase. A subsequent investigation conducted by the MCSO led to the identification of the deceased as Jessica McCormack (hereinafter “McCormack”).
6. Through the course of the investigation, MCSO discovered that McCormack’s last known address was 229 Main Street, Noel, Missouri. This was confirmed by MCSO through prior law enforcement contact and calls for service. A review of calls for service reports obtained from the McDonald County 9-1-1 Dispatch Center conducted by the MCSO showed that on July 16, 2019, law enforcement officers with the Noel, Missouri, Marshal’s Office made contact with McCormack and her three children at McCormack’s residence, 229 Main Street, Noel, Missouri. McCormack’s three children are identified as Jane Doe 1 (four years old), Jane Doe 2 (two years old), and Jane Doe 3 (six months old). The report indicated that Mahamud Tooxoow MAHAMED (hereinafter “MAHAMED”), identified as McCormack’s paramour, was also at the residence at the time and law enforcement officers checked MAHAMED for active warrants while on scene.

7. Dispatch had also received a call from an individual on July 17, 2019, reporting that he/she had been unable to contact McCormack.
8. MAHAMED is the biological father of the two-year-old female child, Jane Doe 2. Jane Doe 1's biological father is Miguel Angel Casillas (hereinafter "Casillas") who resides in Oklahoma. The biological father of Jane Doe 3 cannot be positively identified at this time.
9. On August 8, 2019, after making positive identification of McCormack's body, the MCSO issued an Amber Alert for McCormack's three biological children, who could not be located at McCormack's residence. On August 8, 2019, Jane Doe's 1, 2, and 3 were subsequently located in Des Moines, Iowa, and taken into state custody.
10. On August 12, 2019, your Affiant spoke with Detective Jake Lancaster with the Des Moines, Iowa, Police Department. Detective Lancaster informed your Affiant that the Jane Does were located at 6011 Creston Avenue, Unit 1, Des Moines, Iowa. Malyun Koliso, the resident at 6011 Creston Avenue, Unit 1, informed Detective Lancaster that on August 5, 2019, MAHAMED arrived at her residence with the Jane Does between 6:00 p.m. and 7:00 p.m. Koliso knew MAHAMED from having previously worked with him at the Tyson plant in Noel, Missouri. Koliso reported that on August 8, 2019, at approximately 4:00 a.m., she awoke to the children crying. When she got out of bed, she discovered that MAHAMED was not in the residence. Koliso stated that she found a note from MAHAMED informing her that he could not care for the children and had left.
11. On August 12, 2019, your Affiant spoke with Dianne Cooper with the Missouri Department of Social Services Children's Division in McDonald County, Missouri. Cooper informed your Affiant that an investigation conducted by the Children's Division indicated that the father of McCormack's oldest child was Casillas.

12. On August 8, 2019, MCSO Lieutenant Brandon Barrett interviewed Casillas, who confirmed that Jane Doe 1 is his daughter and that MAHAMED did not have his consent to take Jane Doe 1 outside the state of Missouri, specifically to Iowa.
13. Your Affiant received information from Lt. Barrett that he also interviewed Ibrahim Akfeen on August 12, 2019. Akfeen reported that he used to live at 229 Main Street with McCormack and the Jane Does. Akfeen stated he moved out on July 15, 2019, to move to St. Louis, Missouri. On July 16, 2019, in the early morning hours, while he was in St. Louis, Akfeen received a phone call from McCormack asking him to come pick her and the Jane Does up from her residence at 229 Main Street, Noel, Missouri. McCormack also texted Akfeen to come pick her up. Akfeen did not do so, because he was in St. Louis. This was the last time Akfeen heard from McCormack.
14. Based upon the investigation, July 16, 2019, was the last date any individual observed McCormack to be alive. Furthermore, the last time the Jane Does were observed to be in the state of Missouri, before they were located in Iowa, was on July 16, 2019, at 229 Main Street, Noel, Missouri by Noel Marshal's Officers.
15. An individual must cross a state line to go from the state of Missouri to the state of Iowa.



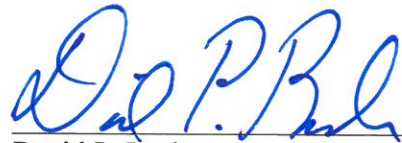
**CONCLUSION**

16. Based on the above facts, this affiant believes there is probable cause in support of a criminal complaint against Mahamud Tooxoow MAHAMED for violation of 18 U.S.C. § 1201(a)(1) and (g), that is, kidnapping of a minor.



Stacy Lee Moore  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me this 13<sup>th</sup> day of August, 2019.



David P. Rush  
United States Magistrate Judge  
Western District of Missouri